

UNITED STATES BANKRUPTCY COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

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In re  
ANDREW GREENHUT,  
Debtor

IN PROCEEDINGS UNDER  
CHAPTER 13  
CASE NO.: 19-10782

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**MOTION OF DEBTOR TO AMEND CHAPTER 13 PLAN**

NOW COMES, the Debtor, Andrew Greenhut, and hereby moves this Honorable Court, pursuant to 11 U.S.C. § 1323(a), MLBR 3015-1 and Chapter 13 Rule 13-10(b), to allow him to amend his Chapter 13 Plan prior to confirmation. As grounds therefore, the Debtor states the following:

1. The Debtor has amended his Chapter 13 Plan to correct certain typographical and arithmetic errors that were identified by the Chapter 13 Trustee during the Meeting of Creditors held on May 2, 2019 and in her Objection to the Debtor's Original Chapter 13 Plan filed on May 6, 2019, as well as those identified by Debtor's Counsel thereafter.
  
2. The Plan Payment Amount and the Plan Term remains unchanged from the Original Chapter 13 Plan.

WHEREFORE, the Debtor respectfully requests that the Court allow the amendment of his Chapter 13 Plan and grant all other relief deemed just and proper.

ANDREW GREENHUT, Debtor  
By his Attorney,

Date: 5/6/2019

*/s/ Richard N. Gottlieb, Esq.*  
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**CERTIFICATE OF SERVICE**

I, Richard N. Gottlieb, Esq., do hereby certify that I have this day served a copy of the Motion of Debtor to Amend Chapter 13 Plan and a copy of the Debtor's First Amended Pre-Confirmation Chapter 13 Plan dated March 11, 2019, by First-class mail postage paid and/or electronically via the CM/ECF Electronic Messaging System on the persons listed below.

Date: May 6, 2019

/s/ Richard N. Gottlieb, Esq.

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**PERSONS SERVED:**

**Carolyn Bankowski, Esq.**  
Chapter 13 Trustee  
(Served via CM/ECF)

**Capital One**

Attn: Bankruptcy  
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**Alex Mattera, Esq.**  
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Counsel to Gita Srivastava  
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